



The Commonwealth of Massachusetts

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

BAY STATE GAS COMPANY
D.T.E. 06-31

FIRST SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO BAY STATE GAS COMPANY

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy ("Department") submits to Bay State Gas Company ("Bay State" or "Company") the following Information Requests:

INSTRUCTIONS

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
2. Answers are due July 18, 2006.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Local or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.

5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please file one copy of the responses with Mary Cottrell, Secretary of the Department and on all parties; also submit, five (5) copies of the responses to A. John Sullivan, Rates and Revenue Requirement Division, and one (1) copy to Elizabeth Jackson, Gas Division.
8. In addition to filing, all non-proprietary responses should be submitted by e-mail to A. John Sullivan, dte.efiling@state.ma.us, and to the e-mail address of any party required to be served.

INFORMATION REQUESTS

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| DTE-BSG-1-1 | Refer to <u>Bay State Gas Company</u> , D.T.E. 05-27, at 130 (2005). Please describe the current status of negotiations, if any, with the Company’s unions concerning the potential outsourcing of its customer call center in Springfield, Massachusetts. |
| DTE-BSG-1-2 | Refer to <u>Bay State Gas Company</u> , D.T.E. 05-27, at 411 (2005). Should the Company engage in a reduction in force with respect to customer call support in Springfield, please discuss how such a reduction in force would affect service quality in Massachusetts. |
| DTE-BSG-1-3 | Refer to <u>Bay State Gas Company</u> , D.T.E. 05-27, at 130 (2005). Should the Company engage in a reduction in force with respect to customer call support in Springfield, how does it propose to return the attendant financial gains to ratepayers? |
| DTE-BSG-1-4 | Refer to Exh. BSG-1, at 13-14. Please provide the dates, locations, names of attendees, and substance of any meetings between the current |

- NiSource employees listed on page 14 and the local management of Bay State between January 1, 2003 and 2006 to date.
- DTE-BSG-1-5 Refer to Exh. BSG-1, at 15. Please provide all studies, analyses, etc. supporting the Company's contention that the services Bay State acquires from NCSC are less costly than the same services available in the private market.
- DTE-BSG-1-6 Refer to BSG-1, at 17. Please provide all studies, analyses, etc. supporting the Company's contention that the acquisition of Columbia Energy Group resulted in stable prices for the Company's ratepayers.
- DTE-BSG-1-7 Refer to BSG-1, at 19. Is it the Company's position that if a company meets the Department's service quality standards, such compliance is sufficient to establish that the company is providing quality service to its ratepayers?
- DTE-BSG-1-8 Refer to Exh. BSG-1, at 21. Please provide all studies, analyses, etc. supporting the Company's contention that it has performed better than the industry average in terms of customer satisfaction.
- DTE-BSG-1-9 Refer to Exh. BSG-1, at 22-23. Please provide all studies, analyses, etc. supporting the Company's contention that customers view the automated call-back system as beneficial. As part of this response, discuss whether customers prefer to speak with live operators.
- DTE-BSG-1-10 Refer to Exh. BSG-1, at 9, lines 17-18. Provide any printed information or plans regarding the business model Bay State and NiSource has implemented. As part of this response, discuss the overall management objectives of NiSource.
- DTE-BSG-1-11 Refer to Exh. BSG-1, at 10, lines 1-2. Provide any printed information or plans discussing the policies and goals established by NiSource and Bay State senior management.
- DTE-BSG-1-12 Refer to Exh. BSG-1, at 11, line 15. Describe the Company's workforce optimization practices, providing examples.
- DTE-BSG- 1-13 Refer to Exh. BSG-1, at 14, line 16. Provide, in chart form, what the Company believes to be an "adequate staffing" level for each of Bay

State's divisions. Also include in this chart Bay State's current staffing levels for each division.

DTE-BSG-1-14 Refer to Exh. BSG-1, at 16, lines 19-20. Provide the exact number of "redundant staff" that were eliminated due to the NiSource acquisition of Columbia. Also, provide a corresponding list of the positions that were eliminated and the location of the employees that filled the redundant positions.

Dated: July 10, 2006